

Message

From: Storrar, Chapin S. [storrarcs@cdmsmith.com]
Sent: 3/8/2019 6:33:13 PM
To: Greene, Nikia [Greene.Nikia@epa.gov]
Subject: Re: Westside Priority Soils OU Butte--Scope Deficient and Defective--Confusion Reigns

Yep. That's frustrating. But some of his concerns will be addressed once we get proposed plan for BPSOU out. It would be nice if he called first instead of just firing off a huge email.

Chapin

From: Greene, Nikia <greene.nikia@epa.gov>
Sent: Friday, March 8, 2019 11:20 AM
To: Storrar, Chapin S.
Subject: FW: Westside Priority Soils OU Butte--Scope Deficient and Defective--Confusion Reigns

This is exactly what I was afraid of.

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From: John Ray <bodinman2003@yahoo.com>
Sent: Friday, March 08, 2019 9:45 AM
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Subject: Westside Priority Soils OU Butte--Scope Deficient and Defective--Confusion Reigns

I read the announcement in today's *Montana Standard* that the EPA is beginning the remedial investigation study for what will be called Westside Priority Soils. I also noticed that the area of this study will be west and north of the Butte Priority Soils Operable Unit, approximately. **EXCLUDED** will be the Flat and, particularly, the Greeley neighborhood.

EPA has been all over the place on this one. First, the Flat and Greeley was excluded. Next, the Flat and Greeley would be included. No, the Flat and Greeley is not included. No, the Flat and Greeley will be sort of considered. (The EPA has never made clear what this sort of consideration means.) Why can't EPA come out with ONE consistent position that is clearly articulated to the public?

Assuming that this ad represents EPA's final position, I respectfully submit the following:

Any new and last operable unit and any new and last remediation study that purports to be comprehensive that does not include the Greeley Neighborhood represents a serious abrogation of Superfund's purpose in Butte to protect citizens and the environment. (This would appear to be the last opportunity to get a comprehensive investigation of the Flat and Greeley.) No cleanup of Butte can be complete or meaningful if the Greeley Neighborhood is excluded from consideration. The Greeley Neighborhood must be fully addressed and remediated under Superfund.

The boundary between the Priority Soils Operable Unit and the Greeley Neighborhood is arbitrary. It is ludicrous to think that pollution from past mining stops at Continental Drive. Also the Flat area was subjected to the airflow of smelter dust from both smelters in Butte and the Smelter in Anaconda. If Superfund is to fulfill its mission, the Greeley and the Flat must be fully and comprehensively addressed.

Therefore, I request:

1. That the Greeley Neighborhood be made an official unit of the Westside Soils Operable Unit and be afforded a full and complete RI/FS process. At the very, very minimum, EPA should clarify how it intends to investigate and remediate contamination in the Greeley and the Flat.
2. That the RMAP program be officially extended to the Greeley Neighborhood.
3. That the EPA clearly articulates a community involvement plan for the Greeley Neighborhood.
4. That explicit consideration be given to environmental justice concerns in the Greeley Neighborhood.

Dr. John W. Ray